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12 United States of America

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15 IN THE UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,

18 Plaintiff,

v.

19 SARAH ANDERSON,
20 FABIAN GOMEZ,
21 EPIFANIO RAMIREZ,
22 WENDY LABUDA,
23 WILLIAM OWEN,
24 JOALEEN ROGERS,

25 Defendants.

26 CASE NO. 2:22-CR-147-WBS

27 STIPULATION REGARDING EXCLUDABLE
28 TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: September 16, 2024

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

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21 STIPULATION

22 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
23 through defendant's counsel of record, hereby stipulate as follows:

24 1. This case is set for a status conference on September 16, 2024.

25 2. By this stipulation, defendants now move to continue the status conference until

26 **December 16, 2024 at 10:00 a.m.**, and to exclude time between September 16, 2024, and December 16,
27 2024, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

28 3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced discovery in this matter, consisting of over 1,300
pages of investigative reports and photographs, including arrest reports, DEA reports, and other

1 supporting documents. The government has also made available to the defense for viewing at the
2 U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple
3 controlled drug buys in the underlying investigation.

4 b) Defense counsel desire additional time to conduct investigation into the charges,
5 the alleged roles of their respective clients, and to review discovery in this case, including
6 watching the video evidence the government has made available. Defense counsel will need
7 additional time to discuss potential resolutions with their clients, prepare pretrial motions, and
8 otherwise prepare for trial.

9 c) Counsel for defendants believe that failure to grant the above-requested
10 continuance would deny them the reasonable time necessary for effective preparation, taking into
11 account the exercise of due diligence.

12 d) The government does not object to the continuance.

13 e) Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 et seq., within which trial must commence, the time period of September 16, 2024 to December
18 16, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
19 Code T4] because it results from a continuance granted by the Court at defendant's request on
20 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
21 best interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5 Dated: September 11, 2024

PHILLIP A. TALBERT
United States Attorney

8 Dated: September 11, 2024

/s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

11 Dated: September 11, 2024

/s/ DANIEL B. OLmos
DANIEL B. OLmos
Counsel for Defendant
SARAH ANDERSON,

14 Dated: September 11, 2024

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

17 Dated: September 11, 2024

/s/ OLAF HEDBERG
OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

19 Dated: September 11, 2024

/s/ TASHA CHALFANT
TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

22 Dated: September 11, 2024

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

25 IT IS SO FOUND AND ORDERED.
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27 Dated: September 12, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE